

**Fill in this information to identify your case:**

United States Bankruptcy Court for the:

EASTERN DISTRICT OF NEW YORK

Case number (if known)

Chapter

11☐ Check if this an amended filing

## Official Form 201

**Voluntary Petition for Non-Individuals Filing for Bankruptcy**

06/22

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and the case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.

1. Debtor's name Linden Center LLC

2. All other names debtor used in the last 8 years

Include any assumed names, trade names and *doing business as* names

3. Debtor's federal Employer Identification Number (EIN) 47-5457765

4. Debtor's address

Principal place of business

Mailing address, if different from principal place of business

33-37 Farrington Street  
Flushing, NY 11354

Number, Street, City, State &amp; ZIP Code

Queens

County

Mr. Howard Konicov  
c/o CFGI340 Madison Avenue, 3rd FL  
New York, NY 10173

P.O. Box, Number, Street, City, State &amp; ZIP Code

Location of principal assets, if different from principal place of business

Number, Street, City, State &amp; ZIP Code

5. Debtor's website (URL) \_\_\_\_\_

6. Type of debtor

☒ Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP))☐ Partnership (excluding LLP)☐ Other. Specify: \_\_\_\_\_

Debtor **Linden Center LLC**  
Name

Case number (if known)

**7. Describe debtor's business**

A. Check one:

- ☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))
- ☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
- ☐ Railroad (as defined in 11 U.S.C. § 101(44))
- ☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))
- ☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))
- ☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))
- ☒ None of the above

B. Check all that apply

- ☐ Tax-exempt entity (as described in 26 U.S.C. §501)
- ☐ Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. §80a-3)
- ☐ Investment advisor (as defined in 15 U.S.C. §80b-2(a)(11))

C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor. See <http://www.uscourts.gov/four-digit-national-association-naics-codes>.

\_\_\_\_\_

**8. Under which chapter of the Bankruptcy Code is the debtor filing?**

A debtor who is a "small business debtor" must check the first sub-box. A debtor as defined in § 1182(1) who elects to proceed under subchapter V of chapter 11 (whether or not the debtor is a "small business debtor") must check the second sub-box.

Check one:

- ☐ Chapter 7
- ☐ Chapter 9

☒ Chapter 11. Check **all** that apply:

- ☐ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D), and its aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$3,024,725. If this sub-box is selected, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
- ☐ The debtor is a debtor as defined in 11 U.S.C. § 1182(1), its aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$7,500,000, **and it chooses to proceed under Subchapter V of Chapter 11**. If this sub-box is selected, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return, or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
- ☐ A plan is being filed with this petition.
- ☐ Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).
- ☐ The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the *Attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11* (Official Form 201A) with this form.
- ☐ The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.

☐ Chapter 12**9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?**

If more than 2 cases, attach a separate list.

- ☒ No.
- ☐ Yes.

District _____	When _____	Case number _____
District _____	When _____	Case number _____

Debtor **Linden Center LLC**  
Name

Case number (if known)

10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor?
- ☒ No  
☐ Yes.

List all cases. If more than 1, attach a separate list

Debtor

Relationship

District

When

Case number, if known

11. Why is the case filed in this district?

Check all that apply:

- ☒ Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.
- ☐ A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

12. Does the debtor own or have possession of any real property or personal property that needs immediate attention?

☒ No☐ Yes.

Answer below for each property that needs immediate attention. Attach additional sheets if needed.

Why does the property need immediate attention? (Check all that apply.)

- ☐ It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.

What is the hazard?

- ☐ It needs to be physically secured or protected from the weather.

- ☐ It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).

- ☐ Other

Where is the property?

Number, Street, City, State &amp; ZIP Code

Is the property insured?

☐ No☐ Yes.

Insurance agency

Contact name

Phone

### Statistical and administrative information

13. Debtor's estimation of available funds

Check one:

- ☒ Funds will be available for distribution to unsecured creditors.
- ☐ After any administrative expenses are paid, no funds will be available to unsecured creditors.

14. Estimated number of creditors

☒ 1-49☐ 50-99☐ 100-199☐ 200-999☐ 1,000-5,000☐ 5001-10,000☐ 10,001-25,000☐ 25,001-50,000☐ 50,001-100,000☐ More than 100,000

15. Estimated Assets

☐ \$0 - \$50,000☐ \$50,001 - \$100,000☐ \$100,001 - \$500,000☐ \$500,001 - \$1 million☐ \$1,000,001 - \$10 million☒ \$10,000,001 - \$50 million☐ \$50,000,001 - \$100 million☐ \$100,000,001 - \$500 million☐ \$500,000,001 - \$1 billion☐ \$1,000,000,001 - \$10 billion☐ \$10,000,000,001 - \$50 billion☐ More than \$50 billion

16. Estimated liabilities

☐ \$0 - \$50,000☐ \$1,000,001 - \$10 million☐ \$500,000,001 - \$1 billion

Debtor

**Linden Center LLC**

Case number (if known)

Name

☐ \$50,001 - \$100,000☐ \$100,001 - \$500,000☐ \$500,001 - \$1 million☒ \$10,000,001 - \$50 million☐ \$50,000,001 - \$100 million☐ \$100,000,001 - \$500 million☐ \$1,000,000,001 - \$10 billion☐ \$10,000,000,001 - \$50 billion☐ More than \$50 billion

Debtor **Linden Center LLC**  
Name

Case number (if known)

**Request for Relief, Declaration, and Signatures****WARNING --** Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.**17. Declaration and signature  
of authorized  
representative of debtor**

The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.

I have been authorized to file this petition on behalf of the debtor.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on **May 23, 2023**  
MM / DD / YYYY**X /s/ Howard Konicov**

Signature of authorized representative of debtor

**Howard Konicov**

Printed name

Title **President****18. Signature of attorney****X /s/ Eric H. Horn**

Signature of attorney for debtor

Date **May 23, 2023**

MM / DD / YYYY

**Eric H. Horn**

Printed name

**A.Y. Strauss LLC**

Firm name

**101 Eisenhower Parkway, Suite 412  
Roseland, NJ 07068**

Number, Street, City, State &amp; ZIP Code

Contact phone **973-287-5006**Email address **ehorn@aystrauss.com**

Bar number and State

**ACTION BY WRITTEN CONSENT  
OF MEMBERS OF  
LINDEN CENTER LLC**

**May 23, 2023**

The undersigned constituting the member possessing the requisite membership units with voting rights (the "Member") of Linden Center LLC, a limited liability company organized under the laws of the State of New York (the "Company"), does hereby consent, pursuant to §407 of the New York Limited Liability Company Act, approve and adopt the following resolutions, with the same force and effect as if duly adopted at a meeting of the members of the Company:

**WHEREAS**, the Company is governed by that certain Operating Agreement, dated as of December 19, 2016 (the "Operating Agreement");

**WHEREAS**, the Member desires to cast a vote for the commencement by the Company of a bankruptcy proceeding under Chapter 11 of Title 11 of the United States Code by filing a petition in the United States Bankruptcy Court for the Eastern District of New York for the Company (the "Bankruptcy Proceedings");

**WHEREAS**, the Bankruptcy Proceedings require a supermajority vote by members of the Company who possess more than 61% of the voting rights in the Company; and

**WHEREAS**, pursuant to the Operating Agreement of the Company, the Company may take any action at a meeting in person, by proxy or by written resolution.

**NOW, THEREFORE, BE IT:**

**RESOLVED**, that the Member has determined that it is in the best interest of the Company to commence the Bankruptcy Proceedings;

**RESOLVED**, that any person who previously held an office of the Company is hereby immediately removed as an officer of the Company;

**RESOLVED**, that the following individual is hereby appointed as an officer of the Company to the office set forth next to their name below, to hold office and to exercise the powers and responsibilities specified in the Operating Agreement of the Company until their respective successor is elected or appointed and qualified:

NAME	OFFICE
Howard Konicov	President

**RESOLVED**, that the Member has determined that it is in best interest of the Company to appoint Howard Konicov as sole signatory and representative of the Company (the "Authorized Representative") in relation to the Bankruptcy Proceedings;

**RESOLVED**, that the Authorized Representative is hereby authorized, directed and empowered, on behalf of and in the name of the Company (i) to execute and verify the Bankruptcy Proceedings and all

documents ancillary thereto, and to cause such Bankruptcy Proceedings to be filed with a bankruptcy court, with relevant jurisdiction, commencing a case (the "Bankruptcy Case"), and to make or cause to be made, prior to the execution thereof, any modifications to such Bankruptcy Proceedings or ancillary documents, and (ii) to execute, verify and file or cause to be filed all other petitions, schedules, lists, motions, applications, declarations, affidavits and other papers or documents necessary, appropriate or desirable in connection with the foregoing;

**RESOLVED**, that the Company be, and hereby is, authorized, empowered and directed to retain the law firm A.Y. Strauss LLC and a commercial real estate broker, to represent the Company as their general bankruptcy counsel on the terms set forth in such firms engagement letter with the Company, which engagement letter is hereby ratified and approved, and to represent and assist the Company in carrying out its duties under the United States Bankruptcy Code, and to take any and all actions to advance the Company's rights and obligations, including, without limitation, the preparation of certain documents to be filed simultaneously with the Bankruptcy Proceedings or during the Bankruptcy Case;

**RESOLVED**, that the Authorized Representative be, and hereby is, with power of delegation, authorized, empowered and directed to execute and file all petitions, schedules, motions, lists, applications, pleadings and other papers and to take and perform any and all further acts and deeds that the Authorized Representative deems necessary, proper or desirable in connection with the Company's Bankruptcy Case, with a view to the successful prosecution of the case;

**RESOLVED**, that each of the aforementioned retained advisors of the Company and the Authorized Representative is hereby authorized to take any and all actions necessary or desirable to advise the Company's rights and obligations and facilitate the commencement of any cases commenced by the Company under the United State Bankruptcy Code;

**RESOLVED**, that the Authorized Representative, be, and hereby is authorized, empowered and directed to take all such further action, in the name and on behalf of the Company, as is consistent with these resolutions and is necessary and proper in order to fully carry out the matters authorized and directed pursuant to these resolutions;

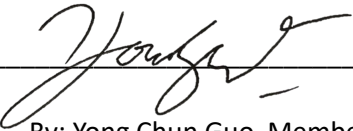
**RESOLVED**, that all actions previously taken by any Member, representative, agent or the Authorized Representative of the Company, or any of its affiliates, in connection with the transactions contemplated by the foregoing resolutions be, and each of the same hereby is, adopted, ratified, confirmed and approved in all respects as the act and deed of the Company; and

**RESOLVED**, that this consent may be delivered by facsimile, electronic mail (including pdf) or other transmission method.

*[Signature Page Follows.]*

**IN WITNESS WHEREOF**, each of the undersigned, has executed this Written Consent as of the date first above written.

Prince USA Group, LLC

By:   
By: Yong Chun Guo, Member



**A.Y. STRAUSS LLC**

Eric H. Horn, Esq.  
Heike M. Vogel, Esq.  
535 Fifth Avenue, 4<sup>th</sup> Floor  
New York, New York 10017  
Tel. (973) 287-5006  
Fax (973) 226-4104

*Proposed Counsel to the Debtor and  
Debtor-in-Possession*

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK**

In re:

LINDEN CENTER LLC,  
  
Debtor.

Chapter 11

Case No. 23-\_\_\_\_\_ (\_\_\_)

**DECLARATION OF HOWARD KONICOV PURSUANT TO FEDERAL  
BANKRUPTCY RULE 1007 AND LOCAL BANKRUPTCY RULE  
1007-4 IN SUPPORT OF THE DEBTOR'S CHAPTER 11 PETITION**

**Howard Konicov**, being duly sworn this 23<sup>rd</sup> day of May 2023, deposes and says under penalty of perjury:

1. I am the recently appointed president of Linden Center LLC, the above-captioned debtor and debtor in possession (the “***Debtor***”). I am also an authorized representative of its parent holding company Prince USA Group LLC with respect to certain matters. In my capacity as president of the Debtor, I am familiar, generally, with the business affairs of the Debtor and understand the facts set forth herein – unless stated to be upon information and belief. I am authorized to make this affidavit on behalf of the Debtor.

2. I submit this declaration (i) in support of the Debtor’s petition for relief under chapter 11 of title 11 of the United States Code (the “***Bankruptcy Code***”), (ii) to assist the

Bankruptcy Court and other interested parties in understanding the circumstances giving rise to the commencement of this chapter 11 case, and (iii) to provide general information about the Debtor's business operations.

### **RELEVANT BACKGROUND**

3. On May 23, 2023, (the "*Petition Date*"), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code.

4. The Debtor continues in possession of its property and the management of its business affairs as a debtor-in-possession pursuant to §§ 1107(a) and 1108 of the Bankruptcy Code.

5. No trustee, examiner or statutory committee has been appointed.

#### **A. The Debtor's Ownership**

6. The ownership of the Debtor is as follows: (i) 80% by Prince USA Group LLC<sup>1</sup>; and (ii) 20% by Linden Tech LLC (David Wong).

7. The Debtor's EIN is 47-5457765.

#### **B. The Debtor's Real Property**

8. The Debtor is the owner of a certain real property located at 33-37 Farrington Street (a/k/a 34-20 Linden Place), Flushing, New York, 11354 (Block 4950 and Lot 18) (the "*Premises*"). The Premises was acquired in 2017 for approximately \$21 million from a bankruptcy estate.

9. The Premises is a multi-story commercial retail building that may currently be

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<sup>1</sup> I understand that the following individuals are members of this entity: Ching Lam a/k/a Henry Lam; Choy Ling Lam a/k/a Rita Lam; Yong Chun Guo, and Suet Man Chan. In light of the Lams' default under various agreements (which obligations were guaranteed by Prince), I understand that Mr. Guo may exercise their voting rights in Prince.

occupied by multiple commercial tenants, including dining establishments, a day care and a doctor's office (each a "***Tenant***" and collectively, the "***Tenants***").

10. Under the various leases, the Tenants are to pay the Debtor approximately \$206,000 in monthly rental payments.

**C. Debtor's Secured Debt Obligations**

11. In connection with the acquisition of the Premises, the Debtor, as borrower, and Dime Bank, as lender, entered into certain loan documents dated as of November 17, 2017, pursuant to which Dime Bank loaned to the Debtor the principal amount of \$12.975 million.

12. The loan is secured by a certain mortgage on the Premises. I understand that Ching Lam a/k/a Henry Lam and Choy Ling Lam a/k/a Rita Lam (together, the "***Lams***") are guarantors of this debt obligation.

13. The loan provides for payment of interest at a rate of 4.75% per annum, with monthly payments of approximately \$74,484.80.

14. The loan matures on December 1, 2024 and any unpaid amounts under the loan facility are due in full at that time.

15. I understand that the Lams did not make mortgage payments and that, as a result, the loan is in default. I understand that Dime Bank did not charge the Debtor with default interest.

16. Sioni Capital LLC ("***Sioni***"), on April 20, 2022, acquired the loan from Dime Bank via an assignment, with such assignment being recorded in the Office of the Queens County Register on July 19, 2022. I understand that Sioni, upon acquisition of the debt from Dime Bank, began charging the Debtor default interest under the loan documents.

17. As of January of this year, Sioni asserts that the amount owing under the loan is

approximately \$16.15 million.

18. Prior to the Petition Date, the Debtor secured funding to enable it to retain professionals to commence this case. The Debtor owes approximately \$75,000 to Yong Chun Guo pursuant to a Secured Promissory Note. That obligation is secured by the Debtor's non-real estate assets.

**D. Other Debts**

19. According to New York City's property tax website, the Debtor appears to owe approximately \$510,000 in outstanding property and / or other taxes.

**E. Debtor's Management**

20. As of the date hereof, I am responsible to manage the Debtor. To my knowledge, the Debtor has no other employees.

21. Prior to my appointment, I understand that the Debtor was managed by Mr. Lam and/or Mrs. Lam, and before that by Mr. David Wong. Due to what appears to be a mismanagement of the Debtor by the Lams, including failure to pay mortgage obligations, delinquency in tax payments and diversion of rents, the Lams were removed from their officer/management positions just prior to my appointment.

22. I understand that the Debtor will require the cooperation of the Lams, and others, to fulfill its disclosure obligations and to prosecute this chapter 11 case. Should such cooperation not be forthcoming, I anticipate that the Debtor will seek to utilize its rights under the Bankruptcy Code, including discovery and subpoena powers, to obtain the necessary information.

**F. Pending Litigation**

23. On December 17, 2019, the Debtor commenced an action against a former tenant and certain guarantors in the New York Supreme Court, County of Queens, titled *Linden Center LLC v. Bao Kang Adult Day Care Center, Inc., et al.*, Index No. 721031/2019. The nature of the action is a breach of the lease agreement based on failure to pay rent.

24. On February 6, 2023, Sioni commenced a foreclosure action against the Debtor and other parties in the New York Supreme Court, County of Queens, titled *Sioni Capital LLC v. Linden Center LLC, et al.*, Index No. 702668/2023.

25. On May 2, 2023, Sioni moved for an appointment of a receiver over the Premises. The return date of such request is May 24, 2023.

26. On March 13, 2023, the City of New York commenced an action against the Debtor and other parties in the New York Supreme Court, County of Queens, titled *The City of New York v. Linden Center LLC, et al.*, Index No. 705286/2023. The nature of the case is an enforcement action by the City of New York.

**27. The Chapter 11 Filing**

28. The Debtor filed this chapter 11 case to right the ship, to permit it to level set under my oversight and restructure and / or satisfy its debt obligations. In connection with such, the Debtor anticipates exploring strategic alternatives in an effort to maximize creditor recovery in short order. One such strategic alternative is a sale of the Premises. The Debtor believes that one of the best ways to maximize creditor recovery, and preserve equity value to its members, is to commence a robust marketing and sale process conducted by reputable real estate professionals, which the Debtor is in the process of retaining. The alternative is to permit Sioni to foreclose on the Premises – which would result in nothing more than a fire

sale and a loss of what may be millions in equity value in the Premises. Such is certainly not beneficial to the Debtor's estate.

**INFORMATION REQUIRED BY  
LOCAL BANKRUPTCY RULE 1007**

29. Local Bankruptcy Rule 1007-4 requires certain information related to each of the Debtors, which is set forth below.

30. **Local Rule 1007-4(a)(i):** The Debtor is not small business within the meaning of Bankruptcy Rule 101(51)(D).

31. **Local Rule 1007-4(a)(ii):** The Debtor may qualify as single asset real estate debtor.

32. **Local Rule 1007-4(a)(iii):** The Debtor owns certain real property located at 33-37 Farrington (a/k/a 34-20 Linden Place), Queens, New York (Block 4950 and Lot 18). The Premises is a commercial building that is currently occupied by various tenants pursuant to their respective lease agreements with the Debtor. The Debtor filed this chapter 11 case in order to restructure or otherwise satisfy its debt obligations pursuant to a plan of reorganization and/or sale under section 363 of the Bankruptcy Code.

33. **Local Rule 1007-4(a)(iv):** This case was not originally commenced under Chapter 7 or 13 of title 11 of the United States Code.

34. **Local Rule 1007-4(a)(v):** Upon information and belief, no committee was organized prior to the order for relief in this chapter 11 case.

35. **Local Rule 1007-4(a)(vi):** I am currently investigating the nature and extent, if any, of the Debtor's unsecured obligations.

36. **Local Rule 1007-4(a)(vii):** Two creditors are secured in this chapter 11 case:

(i) Sioni Capital LLC; and (ii) Yong Chun Guo.

37. **Local Rule 1007-(a)(viii):** A balance sheet is not available for the Debtor.

38. **Local Rule 1007-4(a)(ix):** There are no publicly held securities, stock or debentures.

39. **Local Rule 1007-4(a) (x):** At this juncture, the Debtor is unaware of any property being held by any custodian, public officer, mortgagee, assignee of rents, or secured creditor. That being said, the Debtor may be required to conduct discovery on that point.

40. **Local Rule 1007-4(a) (xi):** See response to Local Rule 1007-4(a)(iii) above.

41. **Local Rule 1007-4(a) (xii):** All real property assets are located in Queens, New York. Discovery may be necessary to determine other assets of the Debtor.

42. **Local Rule 1007-4(a)(xiii):** The actions described herein.

43. **Local Rule 1007-4(a)(xiv):** The Debtor is managed by Howard Konicov.

44. **Local Rule 1007-4(a)(xv):** There is presently no payroll. My compensation is paid through November, 2023.

45. **Local Rule 1007-4(a)(xv):** The members of the Debtor do not intend to take any salary or compensation.

46. **Local Rule 1007(a) (xvi) and (xvii):** For the 30 days following the commencement of the chapter 11 case, provided that the tenants timely pay their rental obligations, the projected cash receipts are approximately \$200,000. The Debtor is in the process of preparing a budget.

47. **Local Rule 1007(a) (xviii):** The Debtor and its Premises are insured by AIX Specialty Insurance Company (commercial general liability) and the Ohio Casualty Insurance

Company (property).

Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury that the foregoing is true and correct.

Dated: May 23, 2023

**LINDEN CENTER LLC**  
*Chapter 11 Debtor and*  
*Debtor-in-Possession*

By: /s/ Howard Konicov  
Name: Howard Konicov  
Title: President



**Fill in this information to identify the case:**Debtor name Linden Center LLCUnited States Bankruptcy Court for the: EASTERN DISTRICT OF NEW YORK

Case number (if known) \_\_\_\_\_

☐ Check if this is an amended filing**Official Form 206D****Schedule D: Creditors Who Have Claims Secured by Property****12/15**

Be as complete and accurate as possible.

**1. Do any creditors have claims secured by debtor's property?**

- ☐ No. Check this box and submit page 1 of this form to the court with debtor's other schedules. Debtor has nothing else to report on this form.
- ☒ Yes. Fill in all of the information below.

**Part 1: List Creditors Who Have Secured Claims**

2. List in alphabetical order all creditors who have secured claims. If a creditor has more than one secured claim, list the creditor separately for each claim.

		Column A Amount of claim  Do not deduct the value of collateral.	Column B Value of collateral that supports this claim	
<b>2.1</b>	<b>Sioni Capital LLC</b> <small>Creditor's Name</small>  <b>989 Sixth Avenue, 15th FL</b> <b>New York, NY 10018</b> <small>Creditor's mailing address</small>  <small>Creditor's email address, if known</small>  <b>Date debt was incurred</b> <b>Nov. 21, 2017</b> <b>Last 4 digits of account number</b>  <b>Do multiple creditors have an interest in the same property?</b> <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Specify each creditor, including this creditor and its relative priority.	Describe debtor's property that is subject to a lien <b>33-37 Farrington Street</b> <b>Flushing, NY 11354</b>  Describe the lien <b>Mortgage</b> Is the creditor an insider or related party? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes Is anyone else liable on this claim? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. Fill out <i>Schedule H: Codebtors</i> (Official Form 206H)  As of the petition filing date, the claim is: Check all that apply <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed	<b>\$16,000,000.00</b>	<b>\$28,000,000.00</b>

<b>2.2</b>	<b>Yong Chun Guo</b> <small>Creditor's Name</small> <b>c/o Lowenstein Sandler</b> <b>Attn: Wojciech F. Jung</b> <b>1251 6th Ave.</b> <b>New York, NY 10020</b> <small>Creditor's mailing address</small>  <small>Creditor's email address, if known</small>  <b>Date debt was incurred</b> <b>May 23, 2023</b> <b>Last 4 digits of account number</b>  <b>Do multiple creditors have an interest in the same property?</b>	Describe debtor's property that is subject to a lien <b>All non real estate assets</b>  Describe the lien <b>Loan</b> Is the creditor an insider or related party? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes Is anyone else liable on this claim? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Fill out <i>Schedule H: Codebtors</i> (Official Form 206H)  As of the petition filing date, the claim is: Check all that apply	<b>\$75,738.00</b>	
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Debtor **Linden Center LLC**

Name

Case number (if known)

☒ No☐ Contingent☐ Yes. Specify each creditor,  
including this creditor and its relative  
priority.☐ Unliquidated☐ Disputed

3. Total of the dollar amounts from Part 1, Column A, including the amounts from the Additional Page, if any.

**\$16,075,738.**  
**00****Part 2: List Others to Be Notified for a Debt Already Listed in Part 1**

List in alphabetical order any others who must be notified for a debt already listed in Part 1. Examples of entities that may be listed are collection agencies, assignees of claims listed above, and attorneys for secured creditors.

If no others need to be notified for the debts listed in Part 1, do not fill out or submit this page. If additional pages are needed, copy this page.

Name and address

On which line in Part 1 did  
you enter the related creditor?Last 4 digits of  
account number for  
this entity

**Fill in this information to identify the case:**Debtor name Linden Center LLCUnited States Bankruptcy Court for the: EASTERN DISTRICT OF NEW YORK

Case number (if known) \_\_\_\_\_

☐ Check if this is an amended filing**Official Form 206G****Schedule G: Executory Contracts and Unexpired Leases**

12/15

**Be as complete and accurate as possible. If more space is needed, copy and attach the additional page, number the entries consecutively.****1. Does the debtor have any executory contracts or unexpired leases?**☐ No. Check this box and file this form with the debtor's other schedules. There is nothing else to report on this form.☒ Yes. Fill in all of the information below even if the contacts of leases are listed on *Schedule A/B: Assets - Real and Personal**Property*

(Official Form 206A/B).

**2. List all contracts and unexpired leases****State the name and mailing address for all other parties with whom the debtor has an executory contract or unexpired lease**2.1. State what the contract or lease is for and the nature of the debtor's interest **Tenant Lease**State the term remaining **Expires 1/31/2026**

List the contract number of any government contract \_\_\_\_\_

**Always Home Social Daycar  
33-37 Farringorn Street  
1st FL  
Flushing, NY 11354**2.2. State what the contract or lease is for and the nature of the debtor's interest **Tenant Lease**State the term remaining **Exp. 1/31/2031**

List the contract number of any government contract \_\_\_\_\_

**Crown One Restaurant Inc.  
34-20 Linden Place  
1st FL  
Flushing, NY 11354**2.3. State what the contract or lease is for and the nature of the debtor's interest **Tenant Lease**State the term remaining **Exp. 9/30/2026**

List the contract number of any government contract \_\_\_\_\_

**Ding Ding Eatery  
34-20 Linden Place  
Flushing, NY 11354**2.4. State what the contract or lease is for and the nature of the debtor's interest **Tenant Lease**State the term remaining **Expires 4/2026**

List the contract number of any government contract \_\_\_\_\_

**Enze Du  
33-35C Farrington St  
Flushing, NY 11354**

Debtor 1 **Linden Center LLC**

First Name

Middle Name

Last Name

Case number (if known)

**Additional Page if You Have More Contracts or Leases****2. List all contracts and unexpired leases****State the name and mailing address for all other parties with whom the debtor has an executory contract or unexpired lease**

2.5. State what the contract or lease is for and the nature of the debtor's interest **Tenant Lease**

State the term remaining **Exp. 12/31/2025**

List the contract number of any government contract

**Jiesheng Group USA Inc.  
34-20 Linden Place  
2nd FL  
Flushing, NY 11354**

**Fill in this information to identify the case:**Debtor name Linden Center LLCUnited States Bankruptcy Court for the: EASTERN DISTRICT OF NEW YORK

Case number (if known) \_\_\_\_\_

☐ Check if this is an amended filing**Official Form 206H  
Schedule H: Your Codebtors****12/15**

Be as complete and accurate as possible. If more space is needed, copy the Additional Page, numbering the entries consecutively. Attach the Additional Page to this page.

**1. Do you have any codebtors?**☐ No. Check this box and submit this form to the court with the debtor's other schedules. Nothing else needs to be reported on this form.☒ Yes

**2. In Column 1, list as codebtors all of the people or entities who are also liable for any debts listed by the debtor in the schedules of creditors, Schedules D-G. Include all guarantors and co-obligors. In Column 2, identify the creditor to whom the debt is owed and each schedule on which the creditor is listed. If the codebtor is liable on a debt to more than one creditor, list each creditor separately in Column 2.**

*Column 1: Codebtor**Column 2: Creditor***Name****Mailing Address****Name***Check all schedules that apply:*2.1 **Ching Lam a/k/a  
Henry Lam****125 Jefferson Street  
Garden City, NY 11530****Sioni Capital LLC**☒ D 2.1  
☐ E/F \_\_\_\_\_  
☐ G \_\_\_\_\_2.2 **Choy Ling Lam  
a/k/a Rita****125 Jefferson Street  
Garden City, NY 11530****Sioni Capital LLC**☒ D 2.1  
☐ E/F \_\_\_\_\_  
☐ G \_\_\_\_\_

B2030 (Form 2030) (12/15)

**United States Bankruptcy Court**  
**Eastern District of New York**

In re Linden Center LLC

Debtor(s)

Case No.

Chapter 11

**DISCLOSURE OF COMPENSATION OF ATTORNEY FOR DEBTOR(S)**

1. Pursuant to 11 U.S.C. § 329(a) and Fed. Bankr. P. 2016(b), I certify that I am the attorney for the above named debtor(s) and that compensation paid to me within one year before the filing of the petition in bankruptcy, or agreed to be paid to me, for services rendered or to be rendered on behalf of the debtor(s) in contemplation of or in connection with the bankruptcy case is as follows:
- |   |    |                  |
|---|----|------------------|
| For legal services, I have agreed to accept .....           | \$ | <b>51,738.00</b> |
| Prior to the filing of this statement I have received ..... | \$ | <b>51,738.00</b> |
| Balance Due .....   | \$ | <b>0.00</b>      |
2. The source of the compensation paid to me was:
- ☐ Debtor ☒ Other (specify): **Debtor and Yong Chun Guo**
3. The source of compensation to be paid to me is:
- ☐ Debtor ☒ Other (specify): **Debtor and Yong Chun Guo**
4. ☒ I have not agreed to share the above-disclosed compensation with any other person unless they are members and associates of my law firm.
- ☐ I have agreed to share the above-disclosed compensation with a person or persons who are not members or associates of my law firm. A copy of the agreement, together with a list of the names of the people sharing in the compensation is attached.
5. In return for the above-disclosed fee, I have agreed to render legal service for all aspects of the bankruptcy case, including:
- a. Analysis of the debtor's financial situation, and rendering advice to the debtor in determining whether to file a petition in bankruptcy;
  - b. Preparation and filing of any petition, schedules, statement of affairs and plan which may be required;
  - c. Representation of the debtor at the meeting of creditors and confirmation hearing, and any adjourned hearings thereof;
  - d. [Other provisions as needed]
    - (a) providing the Debtor with advice and preparing all necessary documents regarding debt restructuring, bankruptcy and asset dispositions;
    - (b) taking all necessary actions to protect and preserve the Debtor's estate during the pendency of this Chapter 11 Case;
    - (c) preparing on behalf of the Debtor, as debtor-in-possession, all necessary motions, applications, answers, orders, reports and papers in connection with the administration of this Chapter 11 Case;
    - (d) counseling the Debtor with regard to its rights and obligations as debtor-in-possession;
    - (e) appearing in Court to protect the interests of the Debtor; and
    - (f) performing all other legal services for the Debtor which may be necessary and proper in these proceedings and in furtherance of the Debtor's operations.
6. By agreement with the debtor(s), the above-disclosed fee does not include the following service:

**CERTIFICATION**

I certify that the foregoing is a complete statement of any agreement or arrangement for payment to me for representation of the debtor(s) in this bankruptcy proceeding.

May 23, 2023

Date

/s/ Eric H. Horn

Eric H. Horn

Signature of Attorney

A.Y. Strauss LLC

101 Eisenhower Parkway, Suite 412

Roseland, NJ 07068

973-287-5006 Fax: 973-226-4104

ehorn@aystrauss.com

Name of law firm

**United States Bankruptcy Court  
Eastern District of New York**

In re **Linden Center LLC**

Debtor(s)

Case No.

Chapter

**11**

**LIST OF EQUITY SECURITY HOLDERS**

Following is the list of the Debtor's equity security holders which is prepared in accordance with rule 1007(a)(3) for filing in this Chapter 11 Case

Name and last known address or place of business of holder	Security Class	Number of Securities	Kind of Interest
<b>Linden Tech LLC David Wong 25 Shelter Rock Road Manhasset, NY 11030</b>		<b>20%</b>	<b>Membership Interests</b>
<b>Prince USA Group LLC 112-47 Roosevelt Ave. 2nd FL Corona, NY 11368</b>		<b>80%</b>	<b>Membership Interests</b>

**DECLARATION UNDER PENALTY OF PERJURY ON BEHALF OF CORPORATION OR PARTNERSHIP**

I, the **President** of the corporation named as the debtor in this case, declare under penalty of perjury that I have read the foregoing List of Equity Security Holders and that it is true and correct to the best of my information and belief.

Date **May 23, 2023**Signature **/s/ Howard Konicov  
Howard Konicov**

*Penalty for making a false statement of concealing property:* Fine of up to \$500,000 or imprisonment for up to 5 years or both.  
18 U.S.C. §§ 152 and 3571.

**United States Bankruptcy Court  
Eastern District of New York**

In re **Linden Center LLC**

Debtor(s)

Case No.

Chapter

**11**

**CORPORATE OWNERSHIP STATEMENT (RULE 7007.1)**

Pursuant to Federal Rule of Bankruptcy Procedure 7007.1 and to enable the Judges to evaluate possible disqualification or recusal, the undersigned counsel for **Linden Center LLC** in the above captioned action, certifies that the following is a (are) corporation(s), other than the debtor or a governmental unit, that directly or indirectly own(s) 10% or more of any class of the corporation's(s') equity interests, or states that there are no entities to report under FRBP 7007.1:

**Linden Tech LLC**  
**David Wong**  
**25 Shelter Rock Road**  
**Manhasset, NY 11030**

**Prince USA Group LLC**  
**112-47 Roosevelt Ave.**  
**2nd FL**  
**Corona, NY 11368**

☐ None [*Check if applicable*]

**May 23, 2023**

Date

**/s/ Eric H. Horn**

**Eric H. Horn**

Signature of Attorney or Litigant

Counsel for **Linden Center LLC**

**A.Y. Strauss LLC**

**101 Eisenhower Parkway, Suite 412**

**Roseland, NJ 07068**

**973-287-5006 Fax:973-226-4104**

**ehorn@aystrauss.com**



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33-37 Farringorn Street  
1st FL  
Flushing, NY 11354

Berliner & Pilson  
Attn: Richard Pilson, Esq  
40 Cuttermill Road, 3308  
Great Neck, NY 11021

Ching Lam a/k/a Henry Lam  
125 Jefferson Street  
Garden City, NY 11530

Choy Ling Lam a/k/a Rita  
125 Jefferson Street  
Garden City, NY 11530

Con Ed  
4 Irving Place  
New York, NY 10003

Crown One Restaurant Inc.  
34-20 Linden Place  
1st FL  
Flushing, NY 11354

Ding Ding Eatery  
34-20 Linden Place  
Flushing, NY 11354

Enze Du  
33-35C Farrington St  
Flushing, NY 11354

Gordon & Gordon PC  
Attn: Jason Matuskiewicz  
26 Court St. # 1714  
Brooklyn, NY 11242

IRS  
PO Box 7346  
Philadelphia, PA 19101-3460

Jiesheng Group USA Inc.  
34-20 Linden Place  
2nd FL  
Flushing, NY 11354

Kevin K Tung PC  
Attn: Kevin Tung, Esq.  
136-20 38th Ave, 3D  
Flushing, NY 11354

NYC Building Dept.  
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8th FL  
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